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April 13, 2020

Via ECF

Chambers of Hon. Valerie Caproni, United States District Judge U.S. District Court for the Southern District of New York 40 Foley Square, Room 240 New York, NY 10007

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 04/13/2020

Re: HC2 Station Group, Inc. v. Radiant Life Ministries, Inc., Case No. 1:20-cv-01861-

VEC: Joint Request for Adjournment of Initial Pretrial Conference

Dear Judge Caproni:

MEMO ENDORSED

Pursuant to section 1.C of this Court's Individual Practices in Civil Cases, Plaintiff HC2 Station Group, Inc. ("HC2") and Defendants Radiant Life Ministries, Inc. ("RLM") and Michael Jerome Daly, Esq. ("Daly" and, collectively with HC2 and RLM, the "Parties"), by their respective undersigned attorneys, jointly request the following modifications to the Court's March 4, 2020 Notice of Initial Pretrial Conference, ECF No. 7 (the "Notice"):

- 1. That the Parties' deadline for submitting the joint letter required by paragraph 2 of the Notice be extended to **May 7, 2020**;
- 2. That the Initial Pretrial Conference ("IPTC") currently scheduled for April 17, 2020 be adjourned to **May 15, 2020** (or, if the Court determines upon review of the Parties' pre-conference submissions that a case management plan can be entered without a conference, cancelled); and
- 3. That, to the extent the Court determines that an IPTC is necessary, such IPTC be held via teleconference.

The Parties request these modifications to the Court's Notice due to travel and business disruptions relating to the current pandemic. No previous adjournment has been requested by any Party, and all Parties consent to the new proposed dates.

[SIGNATURES ON FOLLOWING PAGE]

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Respectfully submitted,

S/ Matthew J. Reynolds

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Counsel for Plaintiff HC2 Station Group, Inc.

/s/ Thomas F. Urban II

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Counsel for Defendants Radiant Life Ministries, Inc. and Michael Jerome Daly, Esq.

The April 17, 2020, conference is adjourned to May 1, 2020, at 10:00 A.M. The parties' joint pre-conference submissions are due by April 23, 2020.

Date: 04/13/2020

SO ORDERED.

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UNITED STATES DISTRICT JUDGE

HON. VALERIE CAPRONI